

Dear FCC, I would like to address the Amateur Radio Service vanity callsign (HV) fee portion of this proceeding:

1. Presently the HV service fee is also applicable to HV renewals. I think most Amateur Radio operators believe and expect that the FCC's costs with respect to the HV service are or should be incurred at the time of awarding the vanity grant. While technically the issue of the HV service renewal fee may be outside the scope of this proceeding, if the FCC's costs are to be properly allocated to fees, I believe the HV service application fee should be adjusted (increased if necessary) to reflect all costs associated with the HV application process, and renewals should be free.

2. Presently the FCC allows the unsuccessful HV service applicant to apply for a refund of the application fee. Since the FCC still incurs costs with unsuccessful HV applications, it makes sense to reduce the number of unsuccessful HV applications, thus reducing FCC costs. Here are several actions the FCC could take to reduce the number of unsuccessful HV applications:

2.a. Some HV service applicants, in an attempt to increase their chances of being awarded a specific vanity callsign, submit multiple identical HV applications on the same day. Currently, the FCC dismisses all but (at most) one of these applications, and the applicant can then file for a refund of the "extra" application fees. I believe that the FCC should accept these extra applications as "granted in part" and keep the extra application fees. This would not only allow the FCC to retrieve the costs of processing the extra applications, but it would present an increased image of fairness in the HV service application process.

2.b. Since a successful HV service application results in a new license grant valid for ten years, some HV service applicants mistakenly apply for a vanity callsign with the application type of "Renewal/Modification" instead of just "Modification". Currently, the FCC dismisses such applications if the expiration date of the current callsign is more than 90 days beyond the date of filing. My estimate from limited data suggests that perhaps as much as 5% of HV service applications fall into this trap. It is my understanding that, in an application for a new vanity callsign, an application type of "Renewal/Modification" NEVER provides any advantage over a type of just "Modification", so why not just accept these applications as "granted in part"? Such an action would not only reduce FCC costs, but would also improve the FCC's image within the Amateur Radio Service community.